

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

03-MDL-1570 (GBD)(SN)

**TERRORIST ATTACKS ON
SEPTEMBER 11, 2001**

**IRAN NOTICE OF
AMENDMENT**

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This document relates to: Ashton et al v. al Qaeda Islamic Army, et al.,

No. 02-CV-6977(GBD)(SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 3237, as permitted and approved by the Court's Order of July 10, 2018, ECF No. 4045. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☒ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- ☐ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
1	Bruce, David as personal Representative of the Estate of Diane Bruce, Deceased;	CA	USA	Bruce, Mark	Parent	N/A
2	Caballero, Donna as co-personal Representative of the Estate of Rose Lang, Deceased;	NJ	USA	Lang, Rosanne	Parent	N/A
3	Caballero, Donna as co-personal Representative of the Estate of William Lang, Deceased;	NJ	USA	Lang, Rosanne	Parent	N/A
4	Crawford, Elizabeth as personal Representative of the Estate of James	FL	USA	Crawford, Jr., James	Parent	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
	Crawford, Deceased;					
5	Curran, Mary as personal Representative of the Estate of Ada Pascuma, Deceased;	NY	USA	Pascuma, Jr., Michael	Parent	N/A
6	Curran, Mary as personal Representative of the Estate of Michael Pascuma, Deceased;	NY	USA	Pascuma, Jr., Michael	Parent	N/A
7	Dean, Daniel as personal Representative of the Estate of Mark Dean, Deceased;	TN	USA	Dean, William	Sibling	N/A
8	Fletcher, Joanne as personal Representative of the Estate of Marie Hunchak, Deceased;	NY	USA	La Corte, Andrew	Sibling	N/A
9	Galperina, Zhanna as personal Representative of the Estate of Alexander Zaltsman, Deceased;	NY	USA	Zaltsman, Arkady	Parent	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
10	Galperina, Zhanna as personal Representative of the Estate of Faina Zaltsman, Deceased;	NY	USA	Zaltsman, Arkady	Parent	N/A
11	Green, Barbara as personal Representative of the Estate of Jane Zion, Deceased;	FL	USA	Zion, Charles	Parent	N/A
12	Hawk, Larry as personal Representative of the Estate of Phyllis Hawk, Deceased;	NC	USA	Nicosia, Kathleen	Parent	N/A
13	James, Alan as personal Representative of the Estate of Howard James, Deceased;	N/A	UK	Wolf, Katherine	Parent	N/A
14	James, Alan as personal Representative of the Estate of Valerie James, Deceased;	N/A	UK	Wolf, Katherine	Parent	N/A
15	Lang, James as co-personal Representative of the Estate of William Lang, Deceased;	NJ	USA	Lang, Rosanne	Parent	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
16	Lang, James as co-personal Representative of the Estate of Rose Lang, Deceased;	NJ	USA	Lang, Rosanne	Parent	N/A
17	Mercado, Mary as personal Representative of the Estate of Louis Mercado, Jr., Deceased;	FL	USA	Mercado, Steve	Sibling	N/A
18	Mercado, Mary as personal Representative of the Estate of Louis Mercado, Sr., Deceased;	FL	USA	Mercado, Steve	Parent	N/A
19	Nussbaum, Melissa as personal Representative of the Estate of Arline Nussbaum, Deceased;	NY	USA	Nussbaum, Jeffrey	Parent	N/A
20	Passananti, Sean as personal Representative of the Estate of Marie Passananti, Deceased;	NY	USA	Passananti, Horace	Parent	N/A
21	Rambousek, Martin as personal Representative of the Estate of	PA	USA	Rambousek, Lukas	Parent	N/A

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at filing (or death)	New Plaintiff's Citizenship/N ationality on 9/11/2001	9/11 Decedent's Name	New Plaintiff's Relationship to 9/11 Decedent	Paragraphs of Complaint Discussing 9/11 Decedent
	Jindra Rambousek, Deceased;					
22	Rambousek, Martin as personal Representative of the Estate of Michael Rambousek, Deceased;	PA	USA	Rambousek, Lukas	Parent	N/A
23	Reyes, Isabel as personal Representative of the Estate of Clementina Reyes, Deceased;	NY	USA	Reyes, Jr., Eduvigis	Parent	N/A
24	Searby, Fred as personal Representative of the Estate of Diane Tumulty- Searby, Deceased;	DE	USA	Tumulty, Lance	Parent	N/A
25	Srinuan, Lawan as personal Representative of the Estate of Chaleramcha Srinuan, Deceased;	NY	USA	Srinuan, Saranya	Parent	N/A

Dated: December 15, 2021

Respectfully submitted,

KREINDLER & KREINDLER LLP

BY: /s/ James P. Kreindler

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